

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

J-SQUARED TECHNOLOGIES, INC., a)	
Canadian corporation, and J-SQUARE)	
TECHNOLOGIES (OREGON) INC., an)	
Oregon corporation,)	
)	
Plaintiffs,)	
v.)	C.A. No. 04-CV-960-SLR
)	
MOTOROLA, INC., a Delaware)	
corporation,)	
)	
Defendant.)	

**JOINT STIPULATION AND ORDER TO AMEND
DISCOVERY CUTOFF AND EXPERT DISCLOSURE DEADLINES**

The parties have agreed to submit this dispute to private mediation in February 2006. Accordingly, the parties hereby stipulate, subject to approval of the Court, to amend several pretrial deadlines, but not the trial date or the deadline for dispositive motions.

First, the parties seek to amend the discovery deadline imposed by the Court's Order dated November 14, 2005 (D.I. 46). That Order granted the parties' joint request to extend the discovery cutoff to February 15, 2006. The parties now jointly seek an extension to April 3, 2006. This is to accommodate depositions that were to be taken at the very end of this month and in early February; the parties believe that the prospects of settlement will be increased by postponing the depositions until, if necessary, after the mediation.

The parties also seek to amend the expert disclosure deadlines imposed in paragraph 2(g) of the Court's June 3, 2005, Scheduling Order (D.I. 24). That paragraph

provides, "Reports from retained experts under Rule 26(a)(2) on issues for which any party has the burden of proof due by February 1, 2006. Rebuttal expert reports (including expert reports on which party does not have the burden of proof) due by March 17, 2006." The parties jointly seek an extension to March 1, 2006 for the expert disclosure deadline and to April 3, 2006 for the rebuttal expert disclosure deadline. The parties also stipulate that any depositions of rebuttal experts may take place after April 3, 2006.

All other dates set out in the Court's June 3, 2005, Scheduling Order remain unchanged.

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IT IS SO ORDERED this ____ day of _____, 2006.

Chief Judge Sue L. Robinson